

BEFORE THE
Federal Communications Commission

WASHINGTON, D.C.

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MAR 29 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
)

Tariff Filing Requirements for)
Nondominant Common Carriers)
)
)

CC Docket No. 93-36
→


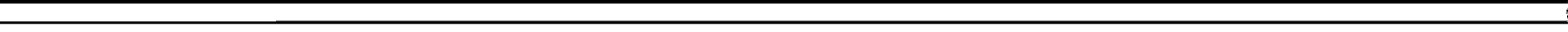



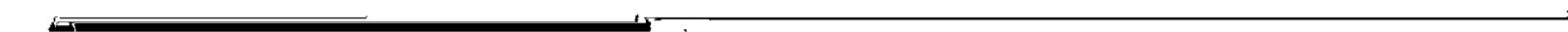




**COMMENTS OF THE
INTERNATIONAL COMMUNICATIONS ASSOCIATION**

The International Communications Association ("ICA"), by its attorney, hereby submits its comments in the above-referenced docket, pursuant to the Commission's Notice of Proposed Rulemaking (FCC 93-103, released February 19, 1993).

ICA is the largest association of telecommunications users in the United States, with more than 720 members who spend at least \$1 million per year upon acquisitions of services and equipment. Because of its growing membership, and their increasing reliance on public telecommunications, ICA members' expenditures on telecommunications are growing rapidly. Recent estimates indicate ICA members spend approximately \$33 billion on telecommunications services and equipment. As heavy users of telecommunications services, ICA members have a special interest in the Commission's deliberations in this proceeding.

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Due to technological innovations and Commission actions over the years, competition has developed in many telecommunications markets. For those common carriers who no longer have market dominance, Commission rules and regulations should allow for far more regulatory flexibility than those carriers that still maintain market dominance. Consequently, the Commission is correct in concluding that the public interest would be well served by allowing for the minimum filing requirements possible



investigation. Existing customers would thereby be protected from significant negative changes beyond their control.

In conclusion, ICA supports the Commission's proposals to streamline the tariff filing process for nondominant common carriers and to allow for those tariffs to be filed on not less than one day notice if existing ratepayers are protected against the possibility of significant negative substantive changes occurring.

Respectfully Submitted,

INTERNATIONAL COMMUNICATIONS ASSOCIATION

By 

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March 29, 1993

CERTIFICATE OF SERVICE

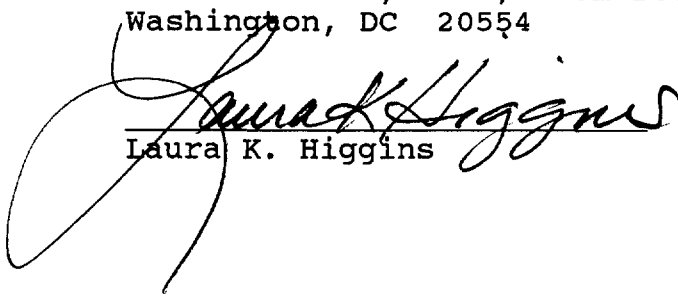
I, Laura K. Higgins, hereby certify that a true and correct copy of the foregoing "Comments of the International Communications Association" were hand delivered this 29th day of March, 1993, to the following:

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